

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

DOUBLE EAGLE CLUB, INC.,)	
)	
)	
)	
VS.)	CIVIL ACTION NO: CV 117-073
)	
BG CAPITAL MANAGEMENT SOUTH)	
FLORIDA, LLC, BG SIGNATURE)	
PROPERTIES, LLC, HELMUT FORERO,)	
And ROBERT D. GENOVESE,)	

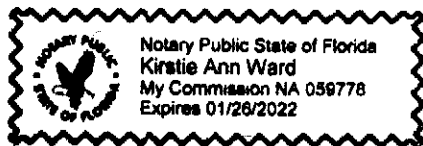
AFFIDAVIT OF ROBERT D. GENOVESE

PERSONALLY APPEARED BEFORE ME, the undersigned officer duly authorized to administer oaths, came Robert D. Genovese, after first being sworn, states under oath the following:

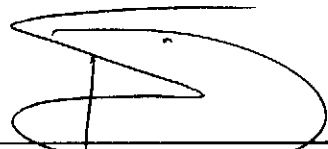
1. My name is Robert D. Genovese.
2. I am also known as Bobby Genovese.
3. I am over eighteen years of age, and of sound mind and memory.
4. On May 2, 2019, I personally contacted Dominion Bank (Toronto) via telephone to request account statements for Dominion Bank (Toronto) credit card account 4520025000653690 for the period October 1, 2015 to present.
5. I provide the following information in accordance with the Court's April 4, 2019 Order.
6. The Dominion Bank representative provided the following in response to the request from Robert D. Genovese for Requested statements for Dominion Bank (Toronto) account 4520025000653690 for Oct 1, 2015 to present:

- a. Description of the request: Requested statements for Dominion Bank (Toronto) account 510084184203 for Oct 1, 2015 to present.
 - b. Date of response by the financial institution: May 2, 2019
 - c. Name of financial institution: Dominion Bank (Toronto)
 - d. Name and title of the institution's representative: Carman (ID # 05022019)
 - e. Reason for the refusal: Dominion Bank (Toronto) has no information as the card account was formerly a CIBC Visa that was taken over by TD Bank.
 - f. Representative's contact information: 1-800-983-8472
7. Carman, the Dominion Bank (Toronto) representative would not provide her last name.
8. Further Affiant Sayeth Not.

This 19 day of June 2019.



Kirstie Ward



Robert D. Genovese

_____(SEAL)

Notary Public _____

Broward County

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Affidavit of Robert D. Genovese was electronically filed using the Court's ECF system and that the below-listed counsel are ECF users and will be served via the ECF System:

Kevin A. Maxim
kmaxim@maximlawfirm.com
Michelle Cohen Egan
megan@maximlawfirm.com
The Maxim Law Firm, P.C.
1718 Peachtree Street, NW, Suite 599
Atlanta, Georgia 30309

Respectfully submitted, this 19th day of June 2019.

/s/ Edward J. Tarver
Edward J. Tarver, Esq.
Georgia Bar No. 698380
Email: etarver@enochtrarver.com
*Attorney for Defendant Robert D.
Genovese*

Enoch Tarver, PC
3540 Wheeler Road
Suite 312
Augusta, GA 30909